

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Lester Jay Chambers

RECEIVED

APR 13 2023

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Rowan University

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Lester C. Chambers

15 Harrell Ave.

Gloicester, Williamstown

New Jersey 08094

856-230-9218

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Rowan University
 Street Address 201 Mullica Hill Rd.
 County, City Gloucester, Glassboro
 State & Zip Code New Jersey 08028

Defendant No. 2

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)



Federal Questions



Diversity of Citizenship



U.S. Government Plaintiff



U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Title VII of the Civil Rights Act of 1964 as amended

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Rowan University - Glassboro

campus

B. What date and approximate time did the events giving rise to your claim(s) occur? 2012 to Present

C. Facts:

What happened to you?

Respondent hired me in September 1998 as a part time housekeeper. In 2012 Respondent promoted me to Locksmith. I am African American. Throughout the duration of my employment Respondent has made me endure harassment and unfair and discriminatory terms and conditions of employment and denied me training opportunities. When Respondent promoted me to locksmith it required me to work the night shift. In 2015 I reported to Respondent that there was racial discrimination in the workplace. After reporting the Discrimination Respondent began retaliating against me. In January or February 2022 Respondent told me to preform plumbing related tasks. Respondent however does not make Caucasian Locksmith William Williams work the night shift or preform plumbing related tasks. In addition to this, while I have asked for overtime many times, Respondent has rejected my requests. Respondent nonetheless allows Mr. Williams to work overtime. While Respondent is aware of the racial discrimination I have experienced, it has not taken remedial action. I allege that Respondent discriminated against me due to my racial or ethnic background and retaliated against me for reporting racial discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended, by providing me with unfair and discriminatory terms and conditions of employment, harassing me and denying me training opportunities.

Who did what?

Harassment:

Ken Kersey, Former Vice President Employee-Labor Relations
Henry Oh, Vice President Employee-Labor Relations
Mike McGrail, Locksmith supervisor
Kevin Muldoon, Senior Director of Facilities

Denial of training opportunities:

Kevin Muldoon, Senior Director of Facilities
Mike McGrail, Locksmith supervisor

Unequal wages:

Henry Oh, Vice President Employee-Labor Relations
Kevin Muldoon, Senior Director of Facilities
Mike McGrail, Locksmith supervisor

Was anyone else involved?

Retaliation:

Ken Kersey, Former Vice President Employee-Labor Relations
Henry Oh, Vice President Employee-Labor Relations
Kevin Muldoon, Senior Director of Facilities
Mike McGrail, Locksmith supervisor

Racial discrimination:

Ken Kersey, Former Vice President Employee-Labor Relations
Henry Oh, Vice President Employee-Labor Relations
Mike McGrail, Locksmith supervisor
Kevin Muldoon, Senior Director of Facilities

Who else saw what happened?

Jeff Jennent: former 3rd shift supervisor

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

Bac X. Nyguyen, MD, Mullica Hill, New Jersey
treated me for Anxiety, Depression, Diabetes, Insomnia, Sleep disturbances

Daniel W. Altman, MD, Turnersville, New Jersey
treated me High Blood Pressure

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. _____

Compensatory Damages one million dollars (\$1,000,000) for violation of my civil rights rights under Title VII of the Civil Rights Act of 1964, as Amended, and, the New Jersey Law Against Discrimination (LAD)*

A "given discriminatory terms and conditions of employment"

B "subjected to harassment"

C "subjected to retaliation"

D "denied training opportunities"

E "given unequal wages due to his race"

F "given discriminatory terms and conditions of employment"

* LAD, New Jersey Statutes Annotated, 10:5-1 et seq.

Punitive Damages three million dollars (\$3,000,000) for my endurance of Defendant's egregious and pervasive acts resulting in my pain and suffering including but not limited to

A family disruption and divorce from the strain of pervasive work controversy

B decline of medical health

C physical and emotional stress


D Prolonged stress, according to the director of the Yale Interdisciplinary Stress Center," increases the risk of heart disease, addiction, mood disorders, and post-traumatic stress disorder...It can influence metabolism, accelerating obesity-related disorders such as diabetes. Stress also saps our ability to regulate emotions and to think clearly.**

* <https://news.yale.edu/2021/12/06/stress-makes-lifes-clock-tick-faster-chilling-out-slows-it-down>

In addition to monetary damages, I beg the Court to seek from the defendant a commitment [detailing] that future discrimination complaints, if any, will be addressed in a timely, judicious, and non-retaliatory manner.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 13th day of April, 20 23.

Signature of Plaintiff 
Mailing Address 15 Harrell Ave
Williamstown NJ
08094
Telephone Number (856) 230-9218
Fax Number (if you have one) _____
E-mail Address lillester1@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: 